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July 14, 2025


MEMO ENDORSED

VIA ECF

Hon. Edgardo Ramos, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

The application is X granted
_____ denied

Re: Neor, et ano. v. Acacia Network, Inc., et. al.
No. 22-cv-04814 (ER)



Edgardo Ramos, U.S.D.J.
Dated: July 15, 2025
New York, New York

Dear Judge Ramos:

We represent Defendants in the above-referenced matter. We write jointly with Plaintiffs' counsel to request that all submission deadlines relating to Plaintiffs' Motion for Class Certification (Dkt. Nos. 235 et seq.) be stayed pending the results of a mediation that the parties have just agreed to engage in.

The parties have agreed to engage in private class-wide mediation with Martin Scheinman, Esq. in an attempt to resolve this matter prior to expending further resources engaging in motion practice. The mediation has been confirmed for October 14, 2025. The date selected is the earliest date in which all attorneys and clients are available on the four dates provided by Mr. Scheinman's office. As such, the parties request that all pending motion deadlines, including the submission of an opposition and reply brief due on July 25, 2025 and August 8, 2025, respectively, be stayed pending the results of the mediation. If the parties' request is granted, we will provide the Court with a status update within 14 days of completion of the mediation, and the parties shall submit their opposition and reply briefs to the class motion by November 17, 2025 and December 1, 2025 respectively if mediation is unsuccessful.

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We thank the Court for its time and attention to this matter.

Respectfully,

/s/ Peter T. Shapiro

Peter T. Shapiro of
LEWIS BRISBOIS BISGAARD & SMITH LLP

/s/ C.K. Lee

C.K. LEE of
LEE LITIGATION GROUP PLLC

cc: All counsel of record (via ECF)